

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

Texas League of United Latin  
American Citizens, et al.,  
*Plaintiffs,*  
v.

Civil Action No.: 5:19-CV-00074-FB  
[Lead Case]

David Whitley; et al.,  
*Defendants,*

MOVE Texas Civic Fund, et al.,  
*Plaintiffs,*

V.

David Whitley, et al.,  
*Defendants,*

Julieta Garibay, et al.,  
*Plaintiffs,*

V.

David Whitley, et al.,  
*Defendants.*

Civil Action No. 5:19-CV-00171-FB  
[Consolidated Case]

Civil Action No. 5:19-CV-00159-FB  
[Consolidated Case]

**PLAINTIFFS MOVE TEXAS CIVIC FUND, ET AL.'s UNOPPOSED MOTION  
FOR LEAVE TO EXCEED PAGE LIMITATION IN RESPONSE TO DEFENDANTS  
DAVID WHITLEY AND KEITH INGRAM's MOTION TO DISMISS**

Plaintiffs Move Texas Civic Fund, JOLT Initiative, League of Women Voters of Texas, and Nivien Saleh (hereinafter, “Plaintiffs”) respectfully request leave of Court for an extension of the page limitation in order to file their Response to Defendants David Whitley and Keith Ingram (“State Defendants”)’s Motion to Dismiss. Case No. 5:19-CV-00171-FB; Dkt. 27.<sup>1</sup> In support, Plaintiffs show the following:

1. Local Rule 7 in the Western District of Texas requires parties to seek leave of Court when a dispositive motion or a response to such motion exceeds 20 pages.
2. On February 12, 2019, State Defendants filed a Motion to Dismiss Plaintiffs’ Complaint that is 36 pages long (Dkt. 27), along with an Unopposed Motion for Leave to Exceed Page Limitations (Dkt. 26).
3. Plaintiffs’ Response to Defendants’ Motion to Dismiss is 35 pages in length.
4. Good cause exists for extending the page limitation for this responsive pleading. The State Defendants move to dismiss Plaintiffs’ claims under Rules of Civil Procedure 12(b)(1), 12(b)(3), and 12(b)(6). Defendants challenge some Plaintiffs’ standing and seek dismissal of six distinct causes of action. Plaintiffs require extra pages to respond to Defendants’ arguments and adequately present these complex issues to the Court. Plaintiffs seek leave to exceed the page limitation in the interest of justice, not for delay, and no party will be prejudiced if leave is granted.
5. The parties have conferred regarding Plaintiffs’ request, and State Defendants are unopposed to this extension.
6. Accordingly, Plaintiffs respectfully request that this motion be granted.

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<sup>1</sup> Unless otherwise indicated, all references to Docket numbers are to documents filed in Case No. 5:19-CV-0171-FB, transferred into this Division on February 21, 2019, and subsequently consolidated with this case.

Respectfully submitted,

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#### ATTORNEYS FOR PLAINTIFFS

\* Motion to Appear Pro Hac Vice pending before  
the Court

\*\* Motion to Appear Pro Hac Vice forthcoming

† Admitted in Massachusetts, not D.C.; practice  
consistent with D.C. App. R. 49(c)(3).

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document was served upon all counsel via this Court's ECF system.

/s/Thomas Buser-Clancy  
Thomas Buser-Clancy